

**To:** Engelman, Alexa[ENGELMAN.ALEXA@EPA.GOV]  
**Cc:** Albright, David[Albright.David@epa.gov]  
**From:** Dermer, Michele  
**Sent:** Mon 3/21/2016 6:38:47 PM  
**Subject:** RE: Records Request

I will forward the letter we wrote to Rob.

**From:** Engelman, Alexa  
**Sent:** Monday, March 21, 2016 11:37 AM  
**To:** Dermer, Michele <Dermer.Michele@epa.gov>  
**Cc:** Albright, David <Albright.David@epa.gov>  
**Subject:** RE: Records Request

Great, I think that would be best coming from you folks than from me, I called David when I got this email and wasn't sure if we had communicated this directly to DOGGR yet (but recall we had to operator).

Thanks,

~Alexa

**From:** Dermer, Michele  
**Sent:** Monday, March 21, 2016 11:31 AM  
**To:** Engelman, Alexa <ENGELMAN.ALEXA@EPA.GOV>  
**Cc:** Albright, David <Albright.David@epa.gov>  
**Subject:** RE: Records Request

Thanks Alexa, as you know, the operator has told us the same thing, but it was a few years ago. At that time I asked them to produce the documentation indicating the formation was exempted as part of the sale of the field. The information they produced, which included a geologic study, is the same report we've seen, and it doesn't mean the aquifer is exempt. They are now recycling the same erroneous information to DOGGR. Not that I am a charitable person but to save DOGGR from chasing its tail I would like to make sure Rob knows we have already evaluated all the documentation. I think David signed a letter dismissing the erroneous claims. I will see if I can find that and we can produce that for DOGGR.

**From:** Engelman, Alexa

**Sent:** Monday, March 21, 2016 10:48 AM  
**To:** Habel, Rob@DOC <[Rob.Habel@conservation.ca.gov](mailto:Rob.Habel@conservation.ca.gov)>  
**Cc:** Craig, Caryn@DOC <[Caryn.Craig@conservation.ca.gov](mailto:Caryn.Craig@conservation.ca.gov)>; Albright, David <[Albright.David@epa.gov](mailto:Albright.David@epa.gov)>; Dermer, Michele <[Dermer.Michele@epa.gov](mailto:Dermer.Michele@epa.gov)>  
**Subject:** RE: Records Request

Rob:

As I mentioned during the meeting last week, we received a FOIA request that included requests for documents related to aquifer exemptions and injection in the Tulare aquifer in the Elk Hills field. We have completed our response to that request and the responsive documents have been posted in FOIA online: <https://foiaonline.regulations.gov/foia/action/public/view/request?objectId=090004d2806bac42>. If the link doesn't work, the FOIA request was *EPA-R9-2015-006449*.

As you stated, a proposed aquifer exemption would need to come through EPA for approval, and EPA does not have record of an aquifer exemption for the Tulare formation in the Elk Hills field.

Best,

Alexa

**From:** Habel, Rob@DOC [<mailto:Rob.Habel@conservation.ca.gov>]  
**Sent:** Monday, March 21, 2016 10:17 AM  
**To:** Engelman, Alexa <[ENGELMAN.ALEXA@EPA.GOV](mailto:ENGELMAN.ALEXA@EPA.GOV)>  
**Cc:** Craig, Caryn@DOC <[Caryn.Craig@conservation.ca.gov](mailto:Caryn.Craig@conservation.ca.gov)>  
**Subject:** Records Request

Alexa:

It is my understanding that EPA has had some inquiries regarding the purported Tulare aquifer exemption in Elk Hills. Would it be possible to get a copy of the records you found in regards to that request? We have been asked the same questions and we cannot find any supporting data that would indicate that the Tulare aquifer has been exempted. We did hear something recently where operators believe that the aquifer was exempted when the federal government (DOE) sold

the field. I would assume that any aquifer exemption would have needed to go through the EPA. Any help on this would be most appreciated.

Thanks,

Robert S. Habel, Special Assistant

*Division of Oil, Gas, and Geothermal Resources*

*California Department of Conservation*

*Natural Resources Agency*

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